Rec'd 6/29/10

RCRA Subtitle I Inspection Report

UST Compliance Inspection

Pepco Transformer Station
3400 Benning Road, NE
Washington, DC 20010

Telephone Number: 202-872-2000

Date of Inspection: June 9, 2010

Facility Identification Number: 9000746

Facility Location: 38° 53.9'N, 076° 57.3'W

EPA Representative:	Austin Brett, Environmental Scientist, Contractor, 703-390-0606
Tank Owner:	Potomac Electric Power Company
Tank Owner Representative:	Fariba Mahvi, Lead Engineer, 202-331-6641

Inspector

Austin Brett

Ms. Austin Brett

Background

On June 9, 2010, the United States Environmental Protection Agency (EPA), Region 3, Land and Chemicals Division, represented by its contractor, Ms. Austin Brett of Tetra Tech EM, Inc. (Tetra Tech), conducted a Compliance Evaluation Inspection (CEI) of the Potomac Electric Power Company (Pepco) Transformer Station located at 3400 Benning Road, NE in Washington, DC to determine the extent of compliance with Subtitle I of the Resource Conservation and Recovery Act (RCRA).

Inspection Observations

Inspection Procedures. Ms. Joanne Cassidy, EPA Region 3 Work Assignment Manager, contacted a representative of this facility during the week of May 24, 2010, to schedule the inspection of the facility. Ms. Brett conducted the inspection on June 9, 2010. Upon arrival at the facility, Ms. Brett provided her credentials to Ms. Fariba Mahvi, Lead Engineer, and Mr. Dan Hume, Senior Engineer Associate and explained the scope and purpose of the inspection. After completing the inspection, Ms. Brett completed the Region 3 Underground Storage Tank (UST) Compliance Checklist, which is included as Attachment 1 to this report.

Tank Descriptions. The Pepco transformer station has one UST (see table 1), which stores new transformer oil used to fill reconditioned transformer units in the adjacent shop. However, the notification to the District of Columbia Department of the Environment (DDOE) indicates that the UST contains diesel fuel. According to the notification to the DDOE, the tank is double-walled, composite (steel with fiberglass-reinforced plastic [FRP]); the tank was installed in January 1988. According to the DC notification, the tank supplies oil to the fill stations inside the shop via cathodically protected double walled galvanized steel pressurized piping. However, during the site inspection, the piping was observed to be suction, not pressurized. See the site diagram sketch in Attachment 1 for an overview of the facility. Attachment 2 contains site photographs.

Tank Release Detection. Releases from the tank are detected by a Veeder Root (VR) TLS-300C monitoring system that conducts Automatic Tank Gauging (ATG) and back-up interstitial space monitoring. Any UST alarms appear on the VR system located in the transformer shop. During the inspection, the VR monitor stated that all functions were normal. Attachment 3 contains VR monitor printouts obtained during the inspection. A monitor training certification was provided during the site inspection and is included in Attachment 4. Attachment 4 also contains a summary of the VR monitoring system certification inspection completed on July 28, 2009.

Table 1
Underground Storage Tank and Piping Details for the 3400 Benning Road, NE Pepco Transformer Station

Tank No.	Material Stored	Capacity (gallons)	Installation Date	Tank Construction Material	Piping Construction Material
1	Transformer Oil	15,000	January 1988	DW Composite (Steel with FRP)	DW Steel

Notes:

FRP – Fiberglass-reinforced plastic.
DW – Double-walled.

Piping Release Detection. Line tightness testing is conducted on the suction piping every three years by Petro Supply, Inc. The last test, completed on September 26, 2008 showed that the piping passed the test. Attachment 5 contains the line tightness testing results.

Spill/Overfill Prevention. The inspector observed an overfill cutoff valve in the fill pipe for the tank and a spill bucket surrounding the fill pipe. The inspector observed a white cloth material in the spill bucket (see photograph 4 in Attachment 2).

Cathodic Protection. The double-walled steel piping is cathodically protected by a galvanic anode system. The system is tested every three years and the last test, indicating passing results, was completed on June 15, 2007. The next test is scheduled for June 18, 2010. Attachment 6 contains results from the last cathodic protection testing results.

Financial Assurance. The facility is insured through Associated Electric & Gas insurance Services Limited (Policy Number X2660A1A09).

Used Oil. The facility drains used oil into drums or aboveground storage tanks located in an adjacent building. The EPA inspector did not observe obvious signs of leaks or spills or oil mishandling.

Other USTs. The inspector did not observe any other USTs at the facility.

Attachments

1. Region 3 UST Compliance Checklist
2. Photo Log
3. Veeder-Root Monitor Printouts
4. Veeder-Root Monitor Training Certificate and Monitoring Certification Summary
5. Petro Supply, Inc. Line Tightness Testing Results
6. Cathodic Protection Testing Results
7. Proof of Financial Assurance

Attachment 1:
Region 3 UST Compliance Checklist

Facility ID Number 9000746 Transformer STATION

Leak Detection Inspection Checklist

I. Ownership of Tank(s)	II. Location of Tank(s)
Potomac Electric Power Company	Tranformer Station 3400 Benning Rd, NE **Number of Tanks at This Location:** 1

III. Tank Information – Complete for each tank. If facility has more than 5 tanks, photocopy page and complete information for additional tanks.

Tank presently in use (circle)	Tank 1	Tank 2	Tank 3	Tank 4
If not, date last used				
If emptied, verify 1" or less of product in tank				
Month and Year Tank Installed	1/1988 Buffside			
Material of Construction tank/pipe	DW steel FRP coated			
Capacity of Tank (in gallons)	15,000			
Substance Stored	transformer oil (new)			

IV. A. Release Detection For Tanks – Check the release detection method(s) used for each tank or N/A if none required

Manual Tank Gauging (tanks under 1,000 gal.)				
Manual Tank Gauging and Tank Tightness Testing (tanks under 2,000 gal.)				
Tank Tightness Testing and Inventory Control				
Automatic Tank Gauging	✓ - interstial mon - backing			
Vapor, Groundwater or Interstitial Monitoring				
Other approved method (SIR)				

IV. B. Release Detection For Piping – Check the release detection method(s) used for piping

Check Pressurized (P) or Suction (S) Piping for each tank	S - DW steel coated			
Automatic Line Leak Detectors, **and** check one	✓			
Vapor or Groundwater Monitoring				
Secondary Containment with Monitoring				
Line Tightness Testing	✓			

I Austin Brett certify that I have inspected the above named facility on ___/___/___
(print name) month/day/year

Inspector's Signature: Austin Brett

Date: 6/10/10

Facility ID Number 9000746

Delivery once a year
650 g - order more

Leak Detection for Piping

Pressurized Piping: A method must be selected from each set. Where applicable, indicate date of last test. If this facility has more than 4 tanks, please photocopy this page and complete information for all additional piping.

Set 1	Tank 1	Tank 2	Tank 3	Tank 4
Automatic Flow Restrictor				
Automatic Shut-off Device				
Continuous Alarm System				
and				
Set 2				
Annual Line Tightness Testing				
Interstitial Monitoring	✓			
If Interstitial Monitoring, documentation of monthly monitoring is available	✓			
Ground-Water or Vapor Monitoring				
If Ground-Water or Vapor Monitoring, documentation of monthly monitoring is available				
Other Approved Method (specify in comments section)				
Suction Piping: Indicate date of most recent test				
Line Tightness Testing (required every 3 years)	✓			
Secondary Containment with Interstitial Monitoring	✓			
Ground-Water or Vapor Monitoring				
Other Approved Method (specify in comments section)				
No Leak Detection Required (must answer yes to all of the following questions)				
Operates at less than atmospheric pressure				
Has only one check valve, which is located directly under pump				
Slope of piping allows product to drain back into tank when suction released				
All above information on suction piping is verifiable				

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: _____

_____

_____

_____

Inspector's Signature: _____ Date: ___

Site Sketch/Photo Log

machinery

transformer oil
15,000 gallon
UST

nothing

nothing

fill

cathodic
protection

cathodic
protection

sump

emergency
cut off
switch

4000 1476
Facility ID Number

Interstitial Monitoring

Manufacturer and name of system: VR TLS-300C

Date system installed: 1993 - RED JACKET before

Materials used for secondary barrier: FRP

Materials used for internal lining: STEEL

Interstitial space is monitored (Circle one): automatically, continuously, monthly basis.

Please answer yes or no for each question.

All tanks in system are fitted with secondary containment and interstitial monitoring.	Yes G	No G	N/A G
System is designed to detect release from any portion of UST system that routinely contains product.	Yes G	No G	N/A G
Monitoring method is documented as capable of detecting a leak as small as .1 gal./hr. with at least a 95% probability of detection and a probability of false alarm of no more than 5%.	Yes G	No G	N/A G
Documentation of monthly readings is available for last 12 months.	Yes G	No G	N/A G
Maintenance and calibration documents and records are available and indicate appropriate maintenance procedures for system have been implemented.	Yes G	No G	N/A G
Monitoring box, if present, is operational.	Yes G	No G	N/A G
If monitoring wells are part of leak detection system, monitoring wells are clearly marked and secured to avoid unauthorized access and tampering.	Yes G	No G	N/A G
Interstitial space is monitored manually on monthly basis (answer the following question).	Yes G	No G	N/A G
Equipment used to take readings is accessible and functional.	Yes G	No G	N/A G
Tank is double-walled	Yes G	No G	N/A G
Tank is fitted with internal bladder to achieve secondary containment (answer the following question).	Yes G	No G	N/A G
Bladder is compatible with substance stored and will not deteriorate in the presence of that substance.	Yes G	No G	N/A G
Excavation is lined with impervious artificial material to achieve secondary containment (answer the following questions).	Yes G	No G	N/A G
Secondary barrier is always above groundwater.	Yes G	No G	N/A G
If secondary barrier is not always above groundwater, secondary barrier and monitoring designs are for use under such conditions.	Yes G	No G	N/A G
Secondary barrier is constructed from artificially constructed material, with permeability to substance < 10^6 cm/sec.	Yes G	No G	N/A G
Secondary barrier is compatible with the regulated substances stored and will not deteriorate in presence of that substance.	Yes G	No G	N/A G
Secondary barrier does not interfere with operation of cathodic protection system.	Yes G	No G	N/A G

Comments: _____

Inspector's Signature: _____ Date: _____

Facility ID Number

Automatic Tank Gauging

Manufacturer, name and model number of system: Veeder root TLS-300C

Please answer yes or no for each question

Device documentation is available at site (e.g., manufacturer's brochures, owner's manual).	Yes G	No G
Device can measure height of product to nearest one-eighth of an inch.	Yes G	No G
Documentation shows that water in bottom of tank is checked monthly to nearest one-eighth of an inch.	Yes G	No G
Documentation is available that the ATG was in test mode a minimum of once a month.	Yes G	No G
Checked for presence of gauge in tanks.	Yes G	No G
Checked for presence of monitoring box and evidence that device is working (i.e., device is equipped with roll of paper for results documentation).	Yes G	No G
Owner/operator has documentation on file verifying method meets minimum performance standards of .20 gph with probability of detection of 95% and probability of false alarm of 5% for automatic tank gauging (e.g., results sheets under EPA's "Standard Test Procedures for Evaluating Leak Detection Methods").	Yes G	No G
Checked documentation that system was installed, calibrated, and maintained according to manufacturer's instructions.	Yes G	No G
Maintenance records are available upon request.	Yes G	No G
Monthly testing records are available for the past 12 months.	Yes G	No G
Daily monitoring records are available for the past 12 months (if applicable).	Yes G	No G

Daily Printout every Saturday - .2 gal/hr

Comments: _____

_____

_____

Inspector's Signature: _____ Date: _____

Facility ID Number

Spill/Overfill Prevention				
	Tank 1	**Tank 2**	**Tank 3**	**Tank 4**
Are all tank transfers less than 25 gallons?	Yes G No G	Yes G No G	Yes G No G	Yes G No G
Spill Prevention				
Is there a spill bucket (at least 5 gallons) or another device that will prevent release of product to the environment (such as a dry disconnect coupling)?	Yes G No G	Yes G No G	Yes G No G	Yes G No G
Overfill Prevention				
What device is used to prevent tank from being overfilled?				
Ball float valve	Yes G No G	Yes G No G	Yes G No G	Yes G No G
Butterfly valve (in fill pipe)	Yes G No G	Yes G No G	Yes G No G	Yes G No G
Automatic alarm monitoring is used	Yes G No G	Yes G No G	Yes G No G	Yes G No G
Other alarm system_____	Yes G No G	Yes G No G	Yes G No G	Yes G No G

DOES THE FACILITY HAVE A FINANCIAL ASSURANCE MECHANISM? YES ✓ NO ___ (PROVIDE COMMENTS AS TO COMPLIANCE STATUS FOR 40 C.F.R. PART 280 SUBPART H.)

Cathodic Protection				
galvanic anode system	**Tank 1**	**Tank 2**	**Tank 3**	**Tank 4**
Sacrificial Anode System				
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes G No G	Yes G No G	Yes G No G	Yes G No G
The last two test results are available. (Tests are required every three years.) 7 JUNE 18th next test	Yes G No G	Yes G No G	Yes G No G	Yes G No G
Impressed Current N/A				
Rectifier is on 24 hours a day?	Yes G No G	Yes G No G	Yes G No G	Yes G No G
The last two test results are available? (Tests are required every 60 days.)	Yes G No G	Yes G No G	Yes G No G	Yes G No G
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes G No G	Yes G No G	Yes G No G	Yes G No G

Comments: White cloth was found in the spill bucket

Inspector's Signature: _____ Date: ___

Facility ID Number N/A

Inventory Control and Tank Tightness Testing

Method of tank tightness testing: _____
Address of tank tightness tester: _____

Please complete all information for each tank. If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

	Tank 1	Tank 2	Tank 3	Tank 4
Date of last tank tightness test.				
Did tank pass test? Indicate yes or no. If no, specify in comments section below the status of the tank or what actions have been taken (e.g., has state been notified?)				
Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.				
Overages or shortages are less than 1% + 130 gals of tank's flow-through volume.				
If no, which months were not?				

Please answer yes or no for each question		
Owner/operator can explain inventory control methods and figures used and recorded.	Yes G	No G
Records include monthly water monitoring.	Yes G	No G
Tank inventory reconciled before and after fuel delivery.	Yes G	No G
Books are reconciled monthly.	Yes G	No G
Appropriate calibration chart is used for calculating volume.	Yes G	No G
Dispenser pumps are calibrated to within 6 cubic inches per five gallons.	Yes G	No G
The drop tube in the fill pipe extends to within one foot of tank bottom.	Yes G	No G
Owner can demonstrate consistency in dipsticking techniques.	Yes G	No G
The dipstick is long enough to reach the bottom of the tank.	Yes G	No G
The ends of the gauge stick are flat and not worn down.	Yes G	No G
The dipstick is marked legibly & the product level can be determined to the nearest 1/8th inch.	Yes G	No G
The tank has been tested within the year & has passed the tightness test (if necessary).	Yes G	No G
A third-party certification of the tank tightness test method is available.	Yes G	No G
Tank tester complied with all certification requirements.	Yes G	No G
Monitoring and testing are maintained and available for the past 12 months.	Yes G	No G

Comments: _____

_____

_____

_____

Inspector's Signature: _____ Date: _____

Facility ID Number N/A

Vapor Monitoring

Name of monitoring device:_____

Date system installed _____ Number of monitoring wells _____

Distance of monitoring well(s) from tank(s) (1) _____ (2) _____ (3) _____ (4) _____

Site assessment was conducted by:_____

Location of site assessment documentation:_____

Please indicate yes or no for each tank – Please complete all information for each tank. If facility has more than 4 tanks, please photocopy this page and complete the information for additional tanks.

	Tank 1	Tank 2	Tank 3	Tank 4
Well is clearly marked and secured.				
Well caps are tight.				
Well is constructed so that monitoring device is not rendered inoperative by moisture or other interferences.				
Well is free of debris or has other indications that it has been recently checked.				

Please answer yes or no for each question

UST excavation zone was assessed prior to vapor monitoring system installation.	Yes G	No G
One or more USTs is/are included in system.	Yes G	No G

If the system is automatic, check the following:

Power box is accessible and power light is on.	Yes G	No G
Documentation of monthly readings is available for last 12 months.	Yes G	No G
Equipment used to take readings is accessible and functional.	Yes G	No G
Vapor monitoring equipment has been calibrated within the last year.	Yes G	No G

If the system is manual, check the following:

Documentation of monthly readings is available for last 12 months.	Yes G	No G
Equipment used to take readings is accessible and functional.	Yes G	No G
Vapor monitoring equipment has been calibrated within the last year.	Yes G	No G
Porous material was used for backfill.	Yes G	No G
Wells are placed within the excavation zone.	Yes G	No G
Level of background contamination is known. If so -- what is level?	Yes G	No G

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: _____

_____

_____

Inspector's Signature: _____ Date: ___

Facility ID Number N/A

Manual Tank Gauging

Manual tank gauging may be used as the sole method of leak detection only for tanks of 1,000 gal. or fewer or in combination with tank tightness testing for tanks of up to 2,000 gal.

Please indicate the number of the tank or tanks for which manual tank gauging is used as the main leak detection method (e.g., tanks 1 & 4):_____

Please answer yes or no for each question		
Records show liquid level measurements are taken at beginning and end of period of at least ([Circle one] 36, 44, 58) hours during which no liquid is added to or removed from the tank.	Yes G	No G
Level measurements are based on average of two consecutive stick readings at both beginning and end of period.	Yes G	No G
Monthly average of variation between beginning and end measurements is less than standard shown below for corresponding size and dimensions of tank and waiting time.	Yes G	No G
Gauge stick is long enough to reach bottom of the tank. Ends of gauge stick are flat and not worn down.	Yes G	No G
Gauge stick is marked legibly and product level can be determined to the nearest one-eighth of an inch.	Yes G	No G
MTG is used as sole method of leak detection for tank.	Yes G	No G
MTG is used in conjunction with tank tightness testing.	Yes G	No G
Are all tanks for which MTG is used under 2,000 gallons in capacity?	Yes G	No G
Are monitoring records available for the last 12 month period?	Yes G	No G

Check One:	Nominal Tank Capacity (in gallons)	Tank Dimensions	Monthly Standard (in gallons)	Minimum Test Duration
( )	**110-550**	**N/A**	**5**	**36 hours**
( )	**551 - 1,000***	**N/A**	**7**	**36 hours**
( )	**1,000***	**64" diameter x 73" length**	**4**	**44 hours**
( )	**1,000***	**48" diameter x 128" length**	**6**	**58 hours**
( )	**1,001 - 2,000***	**N/A**	**13**	**36 hours**

*Manual tank gauging must be used in combination with tank tightness testing for tanks over 550 gal. and up to 2,000 gal.

Comments:_____

_____

_____

Inspector's Signature: _____ Date:__

Facility ID Number N/A

Ground Water Monitoring

Date System Installed: _____

Distance of well from tank(s) (1) _____ (2) _____ (3) _____ (4) _____

Distance of well from piping (1) _____ (2) _____ (3) _____ (4) _____

Site assessment was conducted by: _____

Location of site assessment documentation: _____

Please answer each question of each well. If there are more than 4 wells, please photocopy this page and complete the information for all additional wells.

	Well 1	Well 2	Well 3	Well 4
Well is clearly marked and secured to avoid unauthorized access or tampering.				
Well was opened and presence of water was observed in well at depth of ft.				

Please answer yes or no for each question.

Wells are used to monitor piping.	Yes G	No G
Site assessment was performed prior to installation of wells.	Yes G	No G
Documentation of monthly readings is available.	Yes G	No G
Specific gravity of product is less than one.	Yes G	No G
Hydraulic conductivity of soil between UST system and monitoring wells is not less than 0.01 cm/sec. According to:	Yes G	No G
Groundwater is not more than 20 feet from ground surface.	Yes G	No G
Wells are sealed from the ground surface to top of filter pack.	Yes G	No G
Continuous monitoring device or manual bailing method used can detect the presence of at least one-eighth of an inch of the product on top of groundwater in well.	Yes G	No G
Groundwater is monitored: ( ) Manually on a monthly basis. ( ) Automatically (continuously or monthly basis [Circle one]).		
Check the following if groundwater is monitored manually: Bailer used is accessible and functional.	Yes G	No G
Check the following if groundwater is monitored automatically: Monitoring box is operational.	Yes G	No G
Checked for presence of sensor in monitoring well.	Yes G	No G

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: _____

_____

_____

Inspector's Signature: _____ Date: _____

Facility ID Number N/A

Statistical Inventory Reconciliation

Please complete all information for each tank. If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.				

Please answer yes or no for each question

Records include monthly water monitoring.	Yes G	No G
Tank inventory reconciled before and after fuel delivery.	Yes G	No G
Appropriate calibration chart is used for calculating volume.	Yes G	No G
Dispenser pumps are calibrated to within 6 cubic inches per five gallons.	Yes G	No G
The drop tube in the fill pipe extends to within one foot of tank bottom.	Yes G	No G
Answer one of the following three:		
1) Owner can demonstrate consistency in dipsticking techniques.	Yes G	No G
a) The dipstick is long enough to reach the bottom of the tank.	Yes G	No G
b) The end of the gauge stick is flat and not worn down.	Yes G	No G
c) The dipstick is legible & the product level can be determined to the nearest 1/8th inch.	Yes G	No G
OR		
2) Automatic tank gauge is used for readings.	Yes G	No G
OR		
3) Other method is used for readings (explain in comment section below).	Yes G	No G
A third-party certification of the SIR method is available.	Yes G	No G
Monitoring and testing records are maintained and available for the past 12 months.	Yes G	No G

Comments: _____

_____

_____

Inspector's Signature: _____ Date: _

Attachment 2:
Photo Log

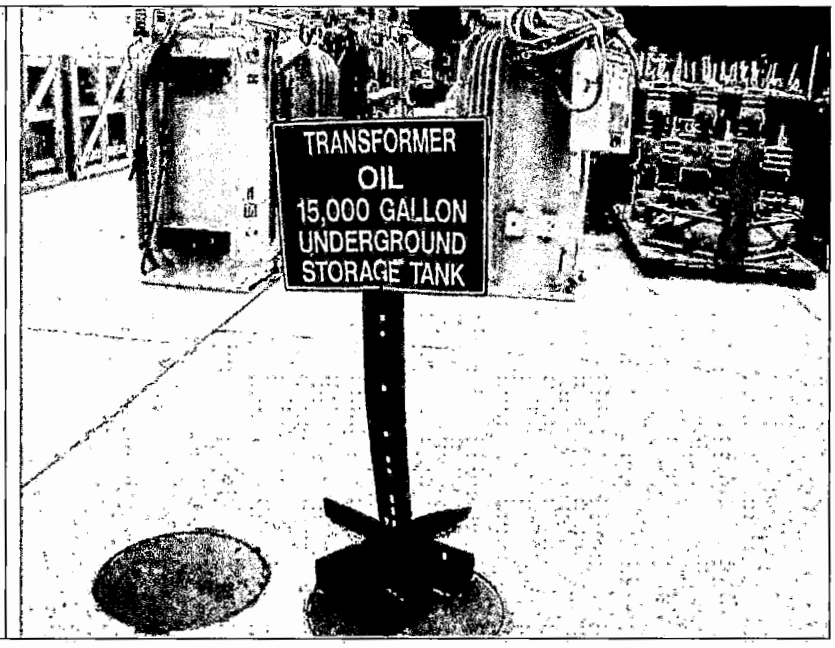
Photo: 1 **Date: June 9, 2010** **Description: View of the UST fill pipe and signage for the UST.**	

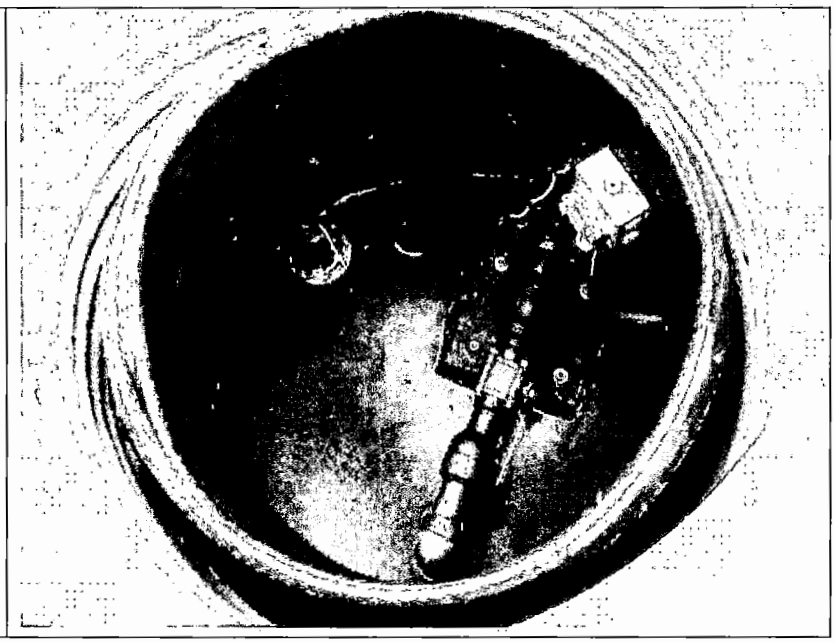
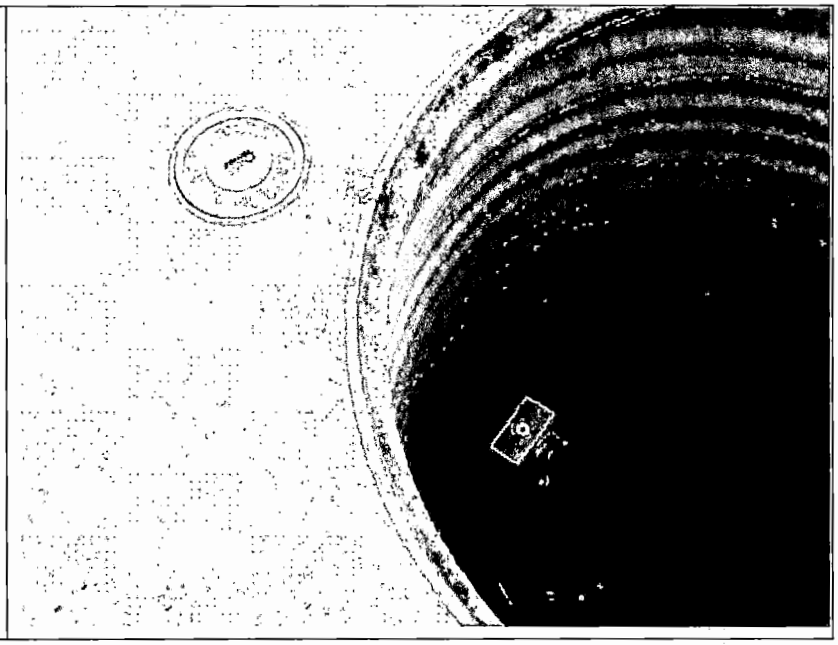
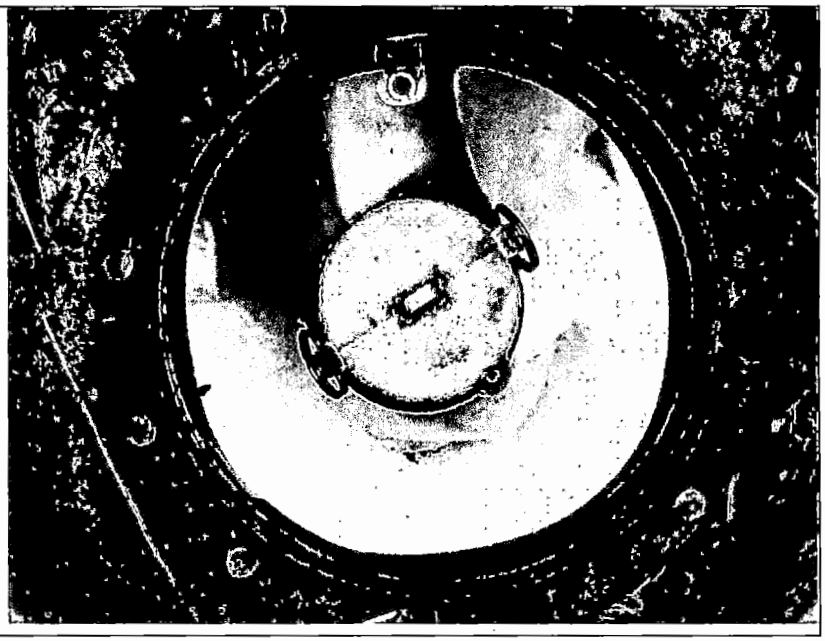
Photo: 2 **Date: June 9, 2010** **Description: View of the UST sump.**	

Photo: 3 **Date: June 9, 2010** **Description: View of the cathodic testing port observed adjacent to the UST sump.**	
Photo: 4 **Date: June 9, 2010** **Description: View of the fill pipe for the UST. Note the white cloth material in the spill bucket.**	

Attachment 3:
Veeder-Root Monitor Printouts

PEPCO
BENNING RD
WASHINGTON DC
202-388-2357

JUN 9, 2010 10:10 AM

LIQUID STATUS
- - - - - - - - - - - - - -
JUN 9, 2010 10:10 AM

L 1:INTERSTITIAL
SENSOR NORMAL

* * * * * END * * * * *

PEPCO
BENNING RD
WASHINGTON DC
202-388-2357

JUN 9, 2010 10:10 AM

LEAK TEST REPORT

T 1:TRANS. OILH
PROBE SERIAL NUM 6716E

MOST RECENT AVERAGED
TEST STARTING TIME:
JUN 5, 2010 7:55 PM

AVG LENGTH = 2.0 HRS
AVG VOLUME = 6808.3 GAL

AVG LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

* * * * * * * * * *

PEPCO
BENNING RD
WASHINGTON DC
202-388-2357

JUN 9, 2010 10:09 AM

INVENTORY REPORT

T 1:TRANS. OILH
VOLUME = 6773 GALS
ULLAGE = 8340 GALS
90% ULLAGE= 6828 GALS
TC VOLUME = 6759 GALS
HEIGHT = 57.89 INCHES
STK HEIGHT= 58.77 INCHES
WATER VOL = 0 GALS
WATER = 0.00 INCHES
TEMP = 64.4 DEG F

* * * * * END * * * * *

Attachment 4:
Veeder-Root Monitor Training Certificate and Monitoring Certification Summary

Technical Training Certification

Certificate of Completion

This certificate is issued in recognition that

Keith E. Griffin
Technician #A24421

has satisfactorily completed

Veeder-Root Startup & Service Technician (Level 4)
in
TLS-3XX UST Monitoring Systems
(Including Secondary Containment Vacuum Sensing - CA only)

Lewis Bell, Technical Training Manager

VEEDER-ROOT

11/9/2008
Date of Issue

11/9/2010
Expiration Date

Print

VEEDER-ROOT Certified Technician

The bearer of this card has successfully completed a manufacturer training course in the listed product(s).

Keith E. Griffin
Technician #A24421
Expires 11/9/2010
Certified UST Monitoring Technician
(Incl. Secondary Containment Vacuum Sensing - CA only)

You may contact TechnicalTraining@gilbarco.com to confirm the current certification record for this person.

K & G PETROLEUM SERVICES, INC.
P.O. BOX 134 ST. LEONARD, MD. 20685-0134
Phone- 410-495-8100 Fax- 410-495-7888
Email-kgpetro@comcast.net

July 29. 2009

Dan Hume
PEPCO Benning Transformer Shop
3400 Benning Rd. N.E.
Building 56
Washington. D.C. 20019

RE: INSPECTION OF THE VEEDER ROOT TLS 300C TANK MONITORING SYSTEM LOCATED AT THE TRANSFORMER SHOP

Dear Dan:

This is to certify that on July 28. 2009 the TLS 300C monitoring system was tested for accuracy of operation.

The Veeder Root TLS 300C control panel is programmed to activate an audible alarm if product or water is detected in the interstice of the tank by the annular space sensor.

The interstitial sensor was removed and the appropriate alarm was activated at the console when the sensor was tested.

The tank probe was removed from the UST and various levels were simulated in order to activate alarm parameters for "max level", "high product", "overfill", "high water warning", "high water alarm", "probe out", "low product" and "delivery needed". All alarms verified and checked out OK.

The inventory report was printed and compared to the actual stick reading that was taken at the UST.

The system set up parameters and all other printed reports were verified and left on site with personnel.

All functions of the Veeder Root TLS 300C monitoring system are operating properly.

Sincerely.

Keith Griffin
K & G Petroleum Services, Inc.
Advanced Technician

Service Order

G PETROLEUM SERVICES, INC.
P.O. Box 134
St. Leonard, MD 20685-0134
Phone 410-495-8100
Fax 410-495-7888

PO #	
Job Name	
Job Address	

Scope of Work: Performed annual inspection o
TLS 300C tank monitoring system. Print
leak test and liquid status reports. T
the fill and compared with inventory
interstitial sensor and verified the ap
activated at the TLS console. Verifica
were correct. Printed the leak test
of .2 gph test results.

Qty.	Material	Qty.	

Authorized Signature George D Hume 7/28

----- SENSOR ALARM -----
L 1:INTERSTITIAL
ANNULAR SPACE
FUEL ALARM
JUL 28, 2009 9:20 AM

PEPCO
BENNING RD
WASHINGTON DC
202-388-2357

JUL 28, 2009 9:24 AM

LIQUID STATUS

JUL 28, 2009 9:24 AM

L 1:INTERSTITIAL
SENSOR NORMAL

* * * * * END * * * * *

PEPCO
BENNING RD
WASHINGTON DC
202-388-2357

SHIFT TIME 1 : 12:00 AM
SHIFT TIME 2 : 6:30 AM
SHIFT TIME 3 : 3:45 PM
SHIFT TIME 4 : DISABLED

TANK PER TST NEEDED WRN
ENABLED
TANK PER TST NEEDED WRN
DAYS = 25
TANK PER TST NEEDED ALM
DAYS = 30
TANK ANN TST NEEDED WRN
DISABLED
LINE PER TST NEEDED WRN
DISABLED
LINE ANN TST NEEDED WRN
DISABLED

PRINT TC VOLUMES
ENABLED

TEMP COMPENSATION
VALUE (DEG F): 60.0
STICK HEIGHT OFFSET
ENABLED

H-PROTOCOL DATA FORMAT
HEIGHT
DAYLIGHT SAVING TIME
ENABLED
START DATE
MAR WEEK 2 SUN
START TIME
2:00 AM
END DATE
NOV WEEK 1 SUN
END TIME

Service Order

G PETROLEUM SERVICES, INC.
P.O. Box 134
St. Leonard, MD 20685-0134
Phone 410-495-8100
Fax 410-495-7888

PO #	Service D
Job Name	Pepco Transfor
Job Address	3400 Benning Rd
	Washington DC

Scope of Work: Performed annual inspection of the Veeder-Root TLS 300C tank monitoring system. Printed out inventory, leak test and liquid status reports. Took stick reading at the fill and compared with inventory report. Tested the interstitial sensor and verified the appropriate alarm was activated at the TLS console. Verified the setup parameters were correct. Printed the leak test history of passe year of .2 gph test results.

Qty.	Material	Qty.	Material

Authorized Signature George D Hume 7/28/09

Attachment 5:
Petro Supply, Inc. Line Tightness Testing Results

8677 Cherry Lane
Laurel, MD. 20707
Phone: (301) 953-3540
Fax: (301) 604-8393

Petro Supply, Inc.

202 Stockton Street
Richmond VA. 23224
Phone: (804) 233-0896
Fax: (804) 231-3716

www.petrosupply.com

Line Test Results

Customer	Facility
Pepco 3400 Benning Road NE Washington, DC 20019	Pepco 3400 Benning Road NE Washington, DC 20019

Product	Hydraulic Fuel	Premium	Plus	Diesel
Type	Suction			
Material	Steel			

	Results	Results	Results	Results
Net Volume Change	000 Pass			

Equipment Utilized: Petro Tite Tester
Certified Technician: Brian Frye
Date: 09/26/08

Attachment 6:
Cathodic Protection Testing Results

Piping & Corrosion Specialties, Inc.

P.O. Box 10 Pasadena, Maryland 21123
Baltimore (410) 544-3232 ♦ Fax (410) 544-1600 ♦ 800-660-5907
Website: www.pipingandcorrosion.com

June 26, 2007

PEPCO
3400 Benning Rd., NE -Bldg. 56
Washington, D.C. 20019

Attn: Dan Hume

Re: Cathodic Protection for Lines for 15,000 gal. Transfer Oil UST – Building #56, Benning Road Plant, Washington, D.C.

Dear Mr. Hume:

We've completed our survey at the above-referenced location. NACE RP-0169-2002 was used as the testing criteria. "On" and "Instant Off" potentials were taken against a portable Cu-CuSO4 reference electrode by grounding to the structure leads at each test station. The test stations were re-wired so that ground bed and structure leads could be disconnected in order to interrupt the circuits. The lines showed potentials that meet the -850 millivolt "Instant Off" criterion; and therefore, the systems comply with State and Federal regulations for corrosion control. Specific test values are included on the attached data sheets.

Please let us know if you have any question, or require further assistance.

Sincerely,

Gerald Gillen

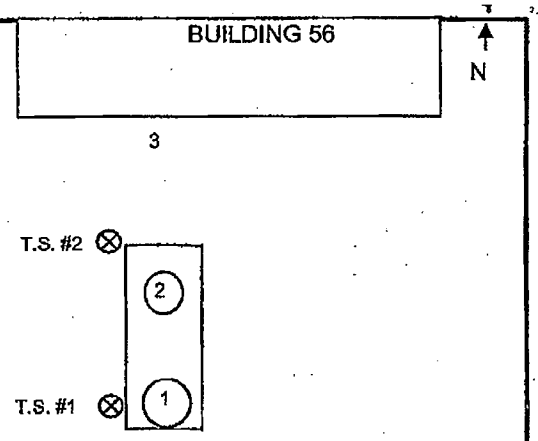
Gerald Gillen
NACE Corrosion Technician
Certification #9212

GRG/jlm
Enclosure

Piping & Corrosion Specialties, Inc.
P.O. Box 10
Pasadena, Md. 21123
Phone: (410) 544-3232
Fax: (410) 544-1600

Company:	PEPCO
Location:	Benning Road Facility - Wash. D.C.
	Transfer Oil Lines for 15,000 gal. UST
Conditions:	warm and dry
Equipment:	Fluke and Miller digital multi-meters
Date:	6-15-07
Job# :	MA-121
Technician:	GG
Data Sheet	1 of 1

NOT TO SCALE



	On	Instant Off						
Cell Location	Vg (against portable Cu-CuSO4 half cell)	Vg (against portable Cu-CuSO4 half cell)						
	millivolts	millivolts						
T.S. #1								
1	-1280	-1177						
2	-1186	-1114						
3	-1224	-1145						
T.S. #2								
1	-1190	-1018						
2	-1063	-886						
3	-1075	-883						

Attachment 7:
Proof of Financial Assurance

ASSOCIATED ELECTRIC & GAS INSURANCE SERVICES LIMITED

Endorsement No. 2 Effective Date of Endorsement October 31, 2009

Attached to and forming part of POLICY No. X2660A1A09

NAMED INSURED Pepco Holdings, Inc.

It is understood and agreed that this POLICY is hereby amended as indicated. All other terms and conditions of this POLICY remain unchanged.

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

DECLARATIONS

Item UST1: A. Name of each covered location:
(See Section 3)

B. Address of each covered location:
(See Section 3)

Item UST2: Policy Number: X2660A1A09

Item UST3: Period of coverage: October 31, 2009 to October 31, 2010

Item UST4: A. Name of Insurer: Associated Electric & Gas Insurance Services Limited

B. Address of Insurer: One Church Street, P.O. Box HM2455, Hamilton, HMJX BERMUDA

Item UST5: A. Name of Insured: - Conectiv

- Potomac Electric Power Company

B. Address of Insured:
800 King Street
Wilmington, DE 19801

701 Ninth Street, N.W.
Washington, DC 20068

INSURING AGREEMENT

1. This Endorsement certifies that the POLICY to which the Endorsement is attached provides liability insurance covering the underground storage tank(s) listed in Section 3 to this Endorsement for taking corrective action and/or compensating third parties for BODILY INJURY and PROPERTY DAMAGE caused by accidental release; in accordance with and subject to the limits of liability, exclusions, conditions, and other terms of the POLICY; arising from operating the underground storage tanks identified Section 3.

The limits of liability of the Insurer's liability are:

$1,000,000 each OCCURRENCE; and

$3,000,000 annual aggregate exclusive of legal defense costs, which are subject to a separate limit under the POLICY.

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

This coverage is provided under POLICY No. X2660A1A09
The effective date of said POLICY is October 31, 2009

2. The insurance afforded with respect to such OCCURRENCES is subject to all of the terms and conditions of the POLICY; provided, however, that any provisions inconsistent with subsections (a) through (e) of this Paragraph 2 are hereby amended to conform with subsections (a) through (e):

   a. Bankruptcy or insolvency of the INSURED shall not relieve the Insurer of its obligations under the POLICY to which this Endorsement is attached.

   b. The Insurer is liable for the payment of amounts within any deductible applicable to the POLICY to the provider of corrective action or a damaged third-party, with a right of reimbursement by the INSURED for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR 280.95 - 280.102.

   c. Whenever requested by a Director of an implementing agency, the Insurer agrees to furnish to the Director a signed duplicate original of the POLICY and all endorsements.

   d. Cancellation or any other termination of the insurance by the Insurer except for nonpayment of premium or misrepresentation by the INSURED will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the INSURED. Cancellation for nonpayment of premium or misrepresentation by the INSURED will be effective only upon written notice and only after expiration of a minimum of ten (10) days after a copy of such written notice is received by the INSURED.

   e. The insurance covers CLAIMS otherwise covered by the POLICY that are reported to the Insurer within six months of the effective date of cancellation or non-renewal of the POLICY except where the new or renewed POLICY has the same retroactive date or a retroactive date earlier than that of the prior POLICY, and which arise out of any covered OCCURRENCE that commenced after the POLICY retroactive date, if applicable, and prior to such POLICY renewal or termination date. CLAIMS reported during such extended reporting period are subject to the terms, conditions, limits, including Limits of Liability, and exclusions of the POLICY.

3.

Name of Covered Location	Address	Number of Tanks
Buzzard Point Generating Station	1st and V Street, SW Washington, DC 20024	2
Benning Generating Station	3400 Benning Road, NE Washington, DC 20019	4
Alabama Avenue Substation	3302 15th Street, SE Washington, DC 20032	1
National Geospatial Intelligence Agency	4600 Sangamore Road Bethesda, MD 20816	1
Morgantown Generating Station	P. O. Box Newburg, MD 29795	1
Forestville Service Center	8300 Old Marlboro Pike Upper Marlboro, MD 20772	6

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

Name of Covered Location	Address	Number of Tanks
Brighton Substation	1300 Brighton Dam Road Brookeville, MD 20833	1
Rockville Service Center	1600 Gaither Road Rockville, MD 20850	5
Pleasantville Operations	2542 Fire Road Egg Harbor Twp., NJ 08234	2
Glassboro Operations	428 Ellis Street Glassboro, NJ 08028	2
Winslow Operations	295 N. Grove Street Berlin, NJ 08009	2
Missouri Avenue Station	Missouri & Grant Aves. Atlantic City, NJ 08401	1
Bridgeton Operations	10 Cohansey Street Bridgeton, NJ 08202	2
Cape May Court House Operations	420 Route 9 North CMCH, NJ 08210	2
Carll's Corner Peaker Station	Burlington, & Central Rds. Carll's Corner, NJ 08234	5
Cedar Station	Rt. 9 Manahawkin, NJ 08050	3
Mickleton Station	Harmony Rd., E of Rt. 130 Mickleton, NJ 08056	2
West Creek	457 Main Street West Creek, NJ 08092	2
Middle Station	Railroad Station Rio Grande, NJ 08242	4
Deepwater Generating Station	373 N. Broadway Pennsville, NJ 08070	1
Midtown Thermal Control Center	1825 Atlantic Avenue Atlantic City, NJ	4
Centerville District Office	Route 213 & Route 18 Centerville, MD 21616	2
Control Center	10611 Westlake Drive Rockville, MD 20817	3

AEGIS

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

I hereby certify that the wording of this instrument is identical to the wording in 40 CFR 280.97 (b) (1) and that the insurer is eligible to provide insurance as an excess or surplus lines insurer in one or more States.

AEGIS Insurance Services, Inc.
Authorized Representative of:
Associated Electric & Gas Insurance Services Limited
1 Meadowlands Plaza
East Rutherford, New Jersey 07073

Signature of Authorized Representative